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UNITED STATES DISTRICT COURT
CLARK COUNTY, NEVADA

MANUEL SANCHEZ,
Plaintiff,
vs.

WAL-MART STORES, INC.; DOES 1-20 and
ROE BUSINESS ENTITIES 1-20, inclusive,
Defendants.

Case No.: 2:18-cv-00282-APG-CWH

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND DISCOVERY
DEADLINES**

[SECOND REQUEST]

Plaintiff MANUEL SANCHEZ ("Plaintiff") and Defendant WAL-MART STORES, INC. ("Walmart"), by and through their respective counsel of record, do hereby stipulate to extend the discovery deadlines in the present case for a period of 60 days Pursuant to Local Rule IA 6-1 and Local Rule 26-4.

Pursuant to Local Rule IA 6-1(a), the parties hereby aver that this is the second such discovery extension requested in this matter.

DISCOVERY COMPLETED TO DATE

- The parties have conducted an FRCP 26(f) conference and have served their respective FRCP 26(a) disclosures;
- Walmart has served written discovery to Plaintiff;
- Plaintiff has Answered Discovery Propounded by Defendant Walmart



**DISCOVERY TO BE COMPLETED AND
REASONS FOR EXTENSION OF DISCOVERY**

Discovery to be completed includes:

- Written Discovery to Defendant Walmart
- Disclosure of expert witnesses;
- Walmart will depose Plaintiff;
- Plaintiff will depose Person Most Knowledge 30(b)(6) for Defendant Walmart
- Depositions of fact witnesses;
- Depositions of expert witnesses and treating medical providers;
- Rule 35 examination of Plaintiff.

The parties aver, pursuant to Local Rule 26-4, that good cause exists for the requested extension. Plaintiff's new counsel Ladah Law Firm substituted in this matter on June 6th, 2018 and the Order granting substitution was filed on June 8th, 2018. Plaintiff's counsel had to also follow with Plaintiff to respond to written discovery from Defendant which answers were served and hand delivered to counsel for Walmart on June 25th, 2018. Parties have now agreed to extend discovery deadlines to conduct the remaining discovery listed above.

As a result of the foregoing, an extension of 60 days is necessary to give Walmart an opportunity to conduct necessary discovery into Plaintiff's medical history in time to make decisions regarding expert witness retention and to retain expert witnesses prior to the expert disclosure deadline. Plaintiff also needs to do additional discovery and depositions to determine what type of experts will need to be retained.

The parties have acted in good faith to request this extension and have no intent, nor reason, to delay the resolution of this matter.

[PROPOSED] NEW DISCOVERY DEADLINES

Discovery Cut-Off Date

Currently: October 12, 2018

Proposed: December 12, 2018

Joint Interim Status Report

motions per Local Rule 26-1(e)(5)

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If this extension is granted, all depositions mentioned above, a Rule 35 examination of Plaintiff, and expert disclosures should be concluded within the stipulated extended deadline. The parties aver that this request for extension of discovery deadlines is made by the parties in good faith and not for the purpose of delay.

DATED this _25___ day of July, 2018

DATED this _25___ day of July, 2018.

/s/ Ramzy P. Ladah

/s/ Ryan Kerbow

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Attorneys for Defendant
Wal-Mart Stores, Inc.

IT IS SO ORDERED:



UNITED STATES MAGISTRATE JUDGE

DATED: July 26, 2018
